THE USE OF PHARMACEUTICAL AND NON-PHARMACEUTICAL GRADE COMPOUNDS IN ANIMALS AND LABELING EXPECTATIONS

Background

Federal regulations require Investigators to use pharmaceutical-grade compounds for injection in animals, even in acute procedures including euthanasia. This includes, but is not limited to, medications/drugs, vehicles, and diluents. Pharmaceutical-grade compounds meet established standards of purity and composition helping ensure animal health and experimental results.

It is recognized that many experimental compounds used in research are not available as pharmaceutical grade, or that pharmaceutical grade compounds may need to be diluted or combined for use in laboratory animal research. The use of chemical grade compounds, combinations of multiple drugs, or dilution of drugs can introduce unexpected or even toxic effects, and should be avoided whenever possible. When chemical grade drugs or compounding is necessary, this must be done using aseptic technique and the final product must be labeled and stored appropriately.

The use of non-pharmaceutical-grade compounds in laboratory animals must be listed in the animal use protocol and approved by the IACUC.

Definitions

1. **Pharmaceutical-grade compounds** are drugs, biologics, reagents, etc. which are approved by the FDA or for which a chemical purity standard has been written/established by the United States Pharmacopeia (USP)/National Formulary or British Pharmacopeia and are intended for injection. USP labeling does not equate to pharmaceutical grade.

2. **The United States Pharmacopeia National Formulary (USP-NF)** provides FDA-enforceable quality standards for drugs, dietary supplements, and excipients as well as procedures for tests, assays and analytical methods. Parenteral articles meet Pharmacopeia requirements for sterility, pyrogens, particulate matter, and other contaminants, and, where appropriate, contain inhibitors of the growth of microorganisms.

3. **An Injection** is a preparation intended for administration through the skin or other external boundary tissue so that the active substance they contain is administered directly into a blood vessel, organ, tissue, or lesion.

4. **Compounding** is a practice in which a person combines, mixes, or alters ingredients of a drug to create a medication tailored to the needs of an individual patient(s).

5. **Non-Pharmaceutical-grade (NPG) compounds** are chemicals or compounds which are not specifically designed for medical use. This would include pure chemicals obtained from Sigma or similar companies that require reconstitution. PBS is also considered non-pharmaceutical as it is not intended for parenteral injection.
Requirements

All agents used in animals must be listed in the IACUC protocol. If compounding of drugs to be injected in animals is necessary, investigators must ensure:

1. **Aseptic preparation** (compounding) of the drug to include sterile containers, filtration or autoclaving of compounded drug if original components are not sterile. Injectable drugs should never be used if they contain particulate matter, precipitates, turbidity, or discoloration.

2. **Appropriate storage** of the compounded drug to include the use of a secondary container and methods which maintain sterility yet allow repeat draws e.g. use of a sterile injection vial with a rubber stopper is highly encouraged. Alternatively, for single use purposes, a sterile microfuge tube can be used.

3. **Appropriate labeling** of containers for storage of compounded drugs to include:
   
   A. Name of the compound(s) and diluent (when applicable)
   B. Final concentration (usually mg/ml)
   C. Date of Expiration
      
      i. Mixtures/Dilutions: The earliest expiration date listed on the stock bottles of agents used
      
      ii. Experimental (NPG) compounds: The expiration date should be based on performance evaluation of the agent(s) for efficacy as well as consideration of the frequency of use/method of storage.

**Note:** It is highly recommended when using compounded drugs that a lab-specific SOP be created to establish proper preparation procedure and expiration for the compounded drug. The length of time a compounded drug can be used should be based on use frequency and performance. Compounded drugs may result in decreased “shelf-life” compared to the stock drug(s). Furthermore, the potential for bacterial contamination is increased when compounding drugs or when drawing from multi-use vials.

4. **IACUC approval** for the use of Non pharmaceutical grade compounds is based on:
   
   A. Scientific necessity
   B. Non-availability of an acceptable veterinary or human pharmaceutical-grade compound
   C. Cost savings is not a justification for using non-pharmaceutical-grade compounds, although OLAW and USDA have made exceptions in cases of limited access resulting in exorbitant costs.
   
   D. Appropriate process for aseptic preparation of compounded drugs for injection in animals

**References**

1. USDA APHIS Animal Care, Policy 3, March 14, 2014.
4. OLAW: Educational Resources: Use of Non- Pharmaceutical-Grade Chemicals and Other Substances in Research with
Institutional Approved SOP for Use of Non-Pharmaceutical-Grade Compounds: Tribromoethanol (Avertin)

Background

Tribromoethanol (TBE) commonly referred to by the brand name Avertin, has been used as an anesthetic agent for mice. There have been a number of published reports of adverse effects subsequent to the use of TBE as an intraperitoneal anesthetic in mice usually as a result of improper mixing and storage. Regulatory agencies have subsequently recommended that the use of TBE be discontinued as an anesthetic in mice when possible. Avertin is only available as a non-pharmaceutical grade compound.

Use

TBE is an anesthetic that provides rapid induction and recovery for single use, short duration (approximately 15-20 minutes) surgical procedures in rodents. Improper preparation, storage, or use of Tribromoethanol can result in severe side effects or ineffective anesthesia. Specifically, TBE degrades in the presence of heat and light, producing toxic by-products that are potent gastrointestinal irritants. The scientific literature indicates that TBE is associated with significant side effects including peritonitis, ileus, and death, particularly when repeated doses are administered. Although TBE is not available in a pharmaceutical grade compound, alternative options for rodent anesthesia would include both pharmaceutical grade injectable and inhalation options. ULAR veterinary staff is available to discuss alternatives to the use of TBE.

In developing this policy the IACUC understands that for many investigators, the use of TBE as a general anesthetic in laboratory animals is a long-standing practice and there may be reluctance to change anesthetics because of the potential ramifications to their animal model and operating procedures. Nevertheless, when taken as a whole, the body of scientific literature on this compound as well as the regulatory requirement to use pharmaceutical-grade drugs in animals presents a compelling case for discontinuing the use of TBE. The IACUC will review the continued use of TBE at the time of three-year renewal on a case-by-case basis; researchers will be required to provide justification for the use of this agent for survival surgery.

Storage and expiration period

TBE must be stored at 2-8°C in light protected containers. When stored at this temperature, the solution may be used for up to two weeks. Frozen TBE solution can be stored at -80°C for up to 6 months.
The animal use protocol can simply reference this SOP or alternatively must provide details regarding the preparation of the working solution and proper storage of the stock solution in the animal use protocol.

References
3. Kohn, DF; Wixson, SK; White, WJ; and Benson, GJ. Anesthesia and Analgesia in Laboratory Animals, 1997.
5. PHS Policy on the Human Care and Use of Laboratory Animals, Frequently Asked Questions

Institutional Approved SOP for Use of Non-Pharmaceutical-Grade Compounds: Saturated Potassium Chloride (KCl)

Background
The American Veterinary Medical Association (AVMA) Guidelines on Euthanasia states that intravenous or intracardiac injection of a solution of supersaturated potassium chloride into an animal under general anesthesia is an acceptable method to enact a quick and humane death consistent with adequate veterinary practices. This method of euthanasia is preferable when euthanizing livestock or wildlife species to reduce the risk of toxicosis for predators or scavengers in situations where carcasses of euthanized animals may be consumed. Saturated KCl is only available as a non-pharmaceutical grade compound.

Use
The potassium ion is cardiotoxic, and rapid intravenous or intracardiac administration of 1 to 2 mmol/kg of body weight will cause cardiac arrest. Saturated potassium chloride has been commonly used to euthanize large animals (rabbits, dogs, cats, sheep, pigs, etc.) under general
anesthesia. Saturated potassium chloride is not available in a pharmaceutical grade form; therefore it must be prepared aseptically using 0.5 micron filters or autoclaved prior to use. Scientific justification for the use of this euthanasia method is to accomplish a quick and humane death during a non-survival procedure in an animal that is under general anesthesia and this agent does not contaminate the animal carcass per environmental landfill requirements.

References


History of Revisions

045-00 - new policy approved 12/14/12
045-01 – revised made and approved 10/18/13
045-02 – the title was revised and clarifications were described for definitions, preparation, storage, and labeling expectations, approved 07/15/16
045-03 – the definition on pharmaceutical-grade compounds was updated to clarify that USP labeling does not equate to pharmaceutical grade, approved 12/21/18.